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October 19, 2015

### BY ECF AND HAND

Hon. Dora L. Irizarry, U.S.D.J.  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Strauss, et al. v. Crédit Lyonnais, S.A., 06-cv-702 (DLI) (MDG)  
Wolf, et al. v. Crédit Lyonnais, S.A., 07-cv-914 (DLI) (MDG)

Dear Judge Irizarry:

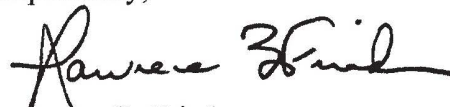
I am writing on behalf of defendant Crédit Lyonnais, S.A. ("CL") to object to plaintiffs' inclusion in their October 16, 2015 letter to the Court of information and argument that the Court did not request and, in any event, is not relevant to the Court's specific jurisdiction analysis, based on what plaintiffs now agree are the mere five transfers that CL made at the request of its customer CBSP and which contacted the United States.

First, plaintiffs refer in their letter to an additional transfer requested by CBSP and which was blocked by CL's New York branch after the branch perceived the transferee's name to be similar to a designated Al Qaeda affiliate. Your Honor has already ruled that this transfer is immaterial because it was not intended for a Hamas-controlled entity. Strauss v. Crédit Lyonnais, S.A., 925 F. Supp. 414, 430 n.10 (E.D.N.Y. 2013) ("[T]he blocking provides limited, if any, support for Plaintiffs, because there is no genuine dispute that Defendant blocked this transaction because the organization had a name similar to the Wafa Humanitarian Organization, which had been designated by OFAC as a fundraiser for Al Qaeda, and that the two organizations are distinct."). Accordingly, this blocked transfer is not relevant to the specific jurisdiction analysis, which concerns CL's contacts with the United States from which plaintiffs' claims arise.

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Second, plaintiffs refer in their letter to various communications that CL's New York branch had with CL's Paris headquarters or United States government agencies. These communications are not relevant to the specific jurisdiction analysis because plaintiffs' claims do not arise from these communications. Instead, they arise from the five transfers.

Respectfully,

A handwritten signature in black ink, appearing to read "Lawrence B. Friedman". The signature is fluid and cursive, with the first name "Lawrence" being more legible than the last name "Friedman".

Lawrence B. Friedman

cc: All counsel